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14 Attorney for Plaintiff,
15 Lillie Perito and Michael Surio

16
17 UNITED STATES DISTRICT COURT
18 SOUTHERN DISTRICT OF CALIFORNIA
19

20 Lillie Perito and Michael Surio,
21 Plaintiff,

22 vs.

23 National Credit Systems, Inc.; and DOES
24 1-10, inclusive,
25 Defendants.
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Case No.: 3:14-cv-02439-LAB-BGS
Complaint filed: October 14, 2014

JOINT MOTION TO DISMISS

JOINT MOTION TO DISMISS

The parties to the above-entitled action, pursuant to FRCP 41(a)(1)(ii), hereby jointly move this Court to dismiss, with prejudice, the above-captioned action, and with each party to bear its own attorneys' fees and costs.

Plaintiff

Defendant

/s/ Trinette G. Kent

/s/ Charity Olson

TRINETTE G. KENT
Attorney for Plaintiff

CHARITY OLSON
Attorney for Defendant

DATED: February 26, 2015

CERTIFICATE OF SERVICE

I, the undersigned, certify and declare that I am over the age of 18 years, and not a party to the above-entitled cause. On February 26, 2015, I served a true copy of foregoing document(s): **JOINT MOTION AND [PROPOSED] ORDER RE: JOINT MOTION TO DISMISS.**

BY ELECTRONIC FILING: I hereby certify that on February 26, 2015, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

Attorney for Defendants National Credit Systems, Inc.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

1 Executed on February 26, 2015
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3 By: /s/ Trinette G. Kent
4 Trinette G. Kent, Esq.
5 Lemberg Law, LLC
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